

**US DISTRICT COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

**Harold Jean-Baptiste
253-37 148 Drive
Rosedale NY 11422**

Plaintiff

V.

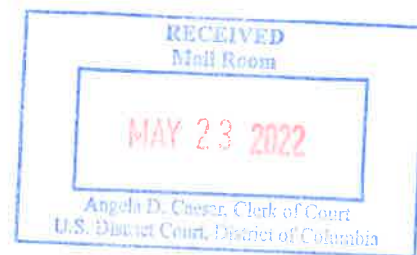
**Booz Allen Hamilton
8283 Greensboro Drive
McLean VA 22102**

Registered Agent:

**CT Corp System
1015 15th Street NW
Suite 1000
Washington DC 20005**

Defendant

Case: 1:22-cv-01499
Assigned To : McFadden, Trevor N.
Assign. Date : 5/23/2022
Description: Employment Discrim. (H-DECK)



**COMPLAINT FOR VIOLATION OF FOURTH AMENDMENT ELECTRONIC
COMMUNICATION PRIVACY ACT of 1986 (ECPA), THE CIVIL RIGHTS ACT
OF 1964 TITLE VII: SEC. 2000e-2. [Section 703](a), SEC. 2000e-2. [Section
703](b), SEC. 2000e-2. [Section 703](d), SEC. 2000e-3. [Section 704](a), CODE OF
VIRGINIA § 18.2-417, D.C LAW § 31-2231.05, 42 U.S. CODE.1981, 42 U.S.
CODE.1983, 42 U.S. CODE.1985(3), 18 U.S. CODE § 241, 42 U.S. CODE § 1986,
42 U.S. CODE § 1985, LACK CARE OF DUTY, FOURTH AMENDMENT,
NINTH AMENDMENT, CRUEL AND HUMAN RIGHTS.**

NATURE OF ACTION

1. Plaintiff bring this action under VIOLATION OF FOURTH AMENDMENT ELECTRONIC COMMUNICATION PRIVACY ACT of 1986 (ECPA), THE CIVIL RIGHTS ACT OF 1964 TITLE VII: SEC. 2000e-2. [Section 703](a), SEC. 2000e-2. [Section 703](b), SEC. 2000e-2. [Section 703](d), SEC. 2000e-3. [Section 704](a), CODE OF VIRGINIA § 18.2-417, D.C LAW § 31-2231.05, 42 U.S. CODE.1981, 42 U.S. CODE.1983, 42 U.S. CODE.1985(3), 18 U.S. CODE § 241, 42 U.S. CODE § 1986, 42 U.S. CODE § 1985, LACK CARE OF DUTY, FOURTH AMENDMENT, NINTH AMENDMENT, CRUEL AND HUMAN RIGHTS. Plaintiff brings this action individually and on behalf of himself on Booz Allen Hamilton who discriminated against him, subjected to a collusion for entrapment by the FBI and employer at his place of work, unfair treatment, constructively discharged and forced to file disability under pressure or perceived that filing for disability would cause plaintiff to violate Federal Laws, suffered retaliation, and/or suffered other types of harassment in whole by the FBI since retaliation and slander/defamation of character in the work place since March 10, 2019 to Feb 24, 2020. In many cases, the harassment and discrimination take the form of hostile work environment, defamation of character, race, color and national of origin and singled out for adverse treatment by Booz Allen Hamilton.

JURISDICTION AND VENUE

2. Jurisdiction is proper in this court in that the district courts have original jurisdiction

over Title VII, under 28 U.S.C. § 1331 and 1343 and 42 U.S.C. § 2000e-5(f)(3), because they arise under the laws of the United States and are brought to recover damages for deprivation of Civil Rights, Constitutional Rights, and violation Federal Laws to not be discriminated in the work place.

3. Venue is proper in this judicial district under 28 U.S.C. § 1391(b)-(c) and 42 U.S.C. § 2000e-5(f)(3), that the defendant's headquarters, or office is located in this district, the personnel records relevant to this case are in this district and the personnel practices challenges herein were directed or supervised by defendants in this district.
4. Plaintiff have exhausted their administrative remedies prior to bringing this suit that the plaintiff has filed timely charges of discrimination and filed a complaint before the Equal Employment Commission on February 2, 2020. Less than 180 days have passed since the right to sue was issue letter on 2/5/20 and the EEOC (#570-2020-00329). Request of FBI and DHS file under Freedom of Information Act (FOIA) files pertaining on this complaint on the plaintiff on 3/2/20, it has not been issued, more information was requested; second request has been formally requested asking for FOIA Public Liaison (FPL) for assistance for the plaintiff on the specific files on 3/28/20. Office of Government Information Services (OGIS) offered no further assistance and issued the request close on April 15, 2020. All attempt and appeal were exhausted to obtain the FOIA files. A prior lawsuit was file with the US Court District of Columbia Civil Division (CASE #20-CV-02178) request relief and the plaintiff dismiss the case without prejudice believing the discrimination would of stop. Judge McFadden had issued a vacant order to stop any other branch of government order, or Executive Order or stop any investigative actions against the plaintiff under the Trump Administration, but that order has been ignored. A second lawsuit was file which is in Superior District of Columbia (CASE # 2021 CAB 000377) which the defendants did not appear, and appeal to DC Appeal Court (CASE # 21-CV-0242) and the case in the Supreme Court #21-1175. All these litigation actions originate at Booz Allen Hamilton office and hindered the plaintiff ability for employment. The plaintiff split his worked at Booz Hamilton 50/40 in the McLean office and in the Washington DC office, the discrimination occurred in both offices, from exclusion of training and discrimination

in both offices, therefore the jurisdiction of this case falls under the US District Court of Columbia domain.

5. Defendant Booz Allen Hamilton is sued herein in his official capacity.
6. Plaintiff Harold Jean-Baptiste, a Black Male Haitian American, is a resident of the state of New York, and was employed by the Booz Allen Hamilton as a Chief Data Scientist. He was discharged from Booz Allen Hamilton as a Chief Data Scientist on Feb 24, 2020, gave first notice of discrimination to Booz Allen Hamilton on September 30, 2019 and filed a timely charge with the EEOC for discrimination on November 02, 2019.

FACTUAL BACKGROUND

7. May 2019 to October 3, 2019
 - a. Plaintiff was treated unfairly by his manager and office mate MaryJo Robinson by excluding plaintiff from work assignment and training in the Mclean, Virginia and District of Columbia offices. Other colleague who not black were included in training and only the plaintiff was Black and Haitian excluded from training and work functions. The role of the plaintiff as Chief Data Scientist of the firm and technical expertise on the team, his responsibility was to hire and manage junior data scientist. The plaintiff's Manager excluded the plaintiff from responsibility part of his job role to manage any staff the plaintiff hired for his team which is the domain of expertise for his role. MaryJo Robinson which is an office mates who is a peer and a white female, manage over 20 staff and has no technical expertise as a data scientist to manage all technical talent such as data scientist. The plaintiff was the only black male and Haitian exclusion from training conference essential for his role. Clearly bias and unfairly treatment by his manager.
8. September 2019 in the second week
 - b. MaryJo Robinson who is Caucasian women and plaintiff was in meeting with Tamara Benjamin-Miles (Senior Associate HR employee who is a Black

national origin from Caribbean island Antigua) was having a meeting about the process of HR for the ESG (Enterprise Services Group) the plaintiff is alleging MaryJo Robinson said “she hated black people” Tamara Benjamin-Miles and plaintiff were the only black Caribbean employees in the office meeting with MaryJo Robinson in Mclean, Virginia. MaryJo Robinson statement was premise to intent for discrimination and illustrated a hostile environment work under and unfair treatment based on race and national origin. MaryJo Robinson was very confrontational and hostile in front of staff Ashley, very abrasive and hostile tone in speaking to the plaintiff in for junior staff. The plaintiff was so uncomfortable to share an office with the MaryJo Robinson abrasive hostile manner he requested by email to change office with the MaryJo Robinson and it was denied by his manager.

9. September 19, 2009

- c. Plaintiff purchased on amazon three items and two of them was recording device for the plaintiff home. The purchase was made on the plaintiff personal computer and the device was for the plaintiff home because plaintiff wanted to get a legal firearm in state of Virginia and plaintiff wanted surveillance for his home for additional safety if someone enter the plaintiff apartment without the plaintiff's permission since the landlord had a key to the plaintiff's apartment in Alexandria, Virginia.

11. September 21, 2019

- a) Plaintiff sent an email on his personal computer at home to Adelle@ninalace.com at 6:42 pm that the plaintiff was having experience of discrimination at the firm and whether to stay or leave Booz Allen Hamilton. The email was about MaryJo Robinson behavior in the office, the email was the plaintiff's experience in the office but sent as bait to see if someone at Booz Allen Hamilton was monitoring at the plaintiff's private Gmail account.

12. September 23, 2019

- d. Laura Broughton came to plaintiff's office in Mclean, Virginia to tell the

plaintiff to have patience that work will get better and it takes time. It was clear Laura Broughton knew of plaintiff thoughts to leave Booz Allen Hamilton, and FBI Agent in Booz Allen Hamilton Building advised Laura Broughton under National Security to come talk to the plaintiff, so the plaintiff do not leave the firm because Laura Broughton and all the plaintiff's colleagues knew the FBI was coming Friday 9/28/19. Booz Allen Hamilton and Laura Broughton was aware of the plaintiff's email to leave the firm and collective participate in the conspiracy to violate the plaintiff's Civil Rights and setup for arrest.

13. September 26, 2019

- e. MaryJo Robinson sent an email in the Mclean, Virginia office inviting the plaintiff to dinner stating it was a senior associate dinner, where Laura Broughton, Julie McGregor and Ingeborg Adams at the dinner. Plaintiff felt they was saying goodbye multiple times to the plaintiff, like the plaintiff was leaving for good. MaryJo Robinson, Laura Broughton, Julie McGregor and Ingeborg Adams was aware FBI agents was coming to the plaintiff's office and believe he would be arrested for violation of Virginia law to not record someone without permission. MaryJo Robinson, Laura Broughton, Julie McGregor and Ingeborg Adams actively conspire to violate the plaintiff's Civil Rights.

14. September 27, 2019

- f. In the morning around 10am Margaret Walker (Senior Associate) email on Skype someone was coming to visit the plaintiff's office, plaintiff thought it was strange that she was emailing the plaintiff to tell the plaintiff facilities was coming to look at the plaintiff's office. Cleaning facilities came to the plaintiff's office every day and no notification was ever sent before. Plaintiff thought that was strange, come to find out FBI Agents in the Booz Allen Hamilton Building advised Margaret Walker to talked to the plaintiff because Margaret Walker had complete knowledge the FBI Agents was coming to his office to look for recording devices in the plaintiff's office, believing the plaintiff came to his office to record people in the office, a direct violation of Virginia privacy laws.

15. September 27, 2019 (Video is recorded in the building of this event.)

g. After lunch 12pm a white female and white male 5 feet 7 and 5 feet 8 wearing white wind breakers with FBI label on back of the wind breaker with guns escorted by contractor armed security guard Shanyque Jacobs who came to escort the FBI agents to the plaintiff's Mclean, Virginia office look around the plaintiff's desk only for recording device at the plaintiff's desk. The plaintiff sent the email as bait and Booz Allen Hamilton believe the plaintiff came to work to record the office mate MaryJo Robinson in the office which is a Federal crime in State of Virginia up to 5 years in prison. A witness was in the office at the time a junior staff was sitting on the desk behind the plaintiff of this discrimination for targeting of the plaintiff at his work place, in which Booz Allen Hamilton actively conspire in to violate the plaintiff's Civil Rights. Only visitors are escorted to Booz Allen Hamilton by armed security guard in the building, employees are not escorted by security to the building according to Booz Allen Hamilton policy. The office has video in the entire building and this is all on video and Booz Allen Hamilton was sent legal notice to save the evidence for this case.

h. All of the plaintiff's colleagues and Booz Allen Hamilton Management were induced under "National Security" by the FBI to violate his Civil Rights by using the employees to target the plaintiff and slander/defamation of the plaintiff's character in his work place. Booz Allen Hamilton along with the FBI conspire to violate the plaintiff's Civil Rights, defame his character and set up the plaintiff up for violation of Laws and Human Rights

16. September 28, 2019 2:28pm (11.1)

i. Plaintiff's emailed his manager of the experience with the FBI in the plaintiff's office looking at the plaintiff's desk for recording devices purchased on amazon for the plaintiff's home use.

17. September 30, 2019 (FBI has video outside the building)

- j. The plaintiff went to the central headquarter of the FBI ask them if they are looking for him, and his available to speak to them. An officer came to speak to the plaintiff outside and stated, “FBI don’t give letter we are investigating or not investigating people”. An older white gentleman in his fifties came outside wearing a suit and tie with blue pen holder in his jacket and walked back in. The officer went back in the building to speak to the older white gentleman and came back outside in 5 minutes and ask the plaintiff for his ID. The plaintiff gave it to him, and he used his radio to headquarter to verify the plaintiff’s Driver License. Two other uniform FBI officers came next to the plaintiff with hands on their guns, while the first officer verify the plaintiff’s identification. The uniformed FBI officers gave the plaintiff a card to call and the plaintiff called the FBI and informed them that the plaintiff had nothing to hide and his was not a threat to anyone the investigation was malice the plaintiff “did not violate any federal laws”, “no criminal history”, “never been arrested”, “investigated for anything criminal” or “ever attempted to carry out any crimes” or “threats to the national security” or “violate any foreign intelligence laws”. They never called the plaintiff back for an interview.

18. October 3, 2020

- k. After lunch plaintiff was called to his manager’s office and the head of HR Chimisa Walker was sitting in his manager’s office and informed the plaintiff Booz Allen Hamilton was putting the plaintiff on paid administrative leave to complete the discrimination claim.

19. October 7, 2020

- l. Request sent to Booz Allen Hamilton for document preservation evidence (data and video and other information) for litigation.

20. October 18, 2019 (Life works record all conversations.)

- m. Plaintiff scheduled meeting with therapist (Paul Hart email: paul@paulhartcs.com) provide by Booz Allen Hamilton and life works (recommended by the firm) because plaintiff was afraid for his life and having

nightmare that his employees was trying to entrap the plaintiff. Plaintiff had difficult time falling asleep and nightmare FBI officers was chasing him.

21. November 1, 2020

Booz Allen Hamilton Retaliated for filling discrimination and stated their investigation found nothing despite video and witness of the experience. Chimisa Walker conspire with the FBI to instruct the plaintiff to file for short term disability instructed by Chimisa Walker. The plaintiff emailed Chimisa Walker on how to file short disability because the plaintiff was unaware of how to file it with Booz Allen Hamilton. An email record of this interaction existed as proof of the conspiracy to violate the plaintiff's Civil Rights.

22. Three weeks prior to Chimisa Walker instructing the plaintiff to file for short term disability the plaintiff was in the emergency room at Virginia Hospital Center with pain on the plaintiff left side hip and shooting down the plaintiff's leg, ETNA disability was file by the plaintiff and this chronic pain had prevented the plaintiff from going back to work and save the plaintiff life from Booz Allen Hamilton and FBI strategy to conspire to violate the plaintiff's Civil Rights and Human Rights. Booz Allen Hamilton was unaware that the plaintiff had a real injury suffered from the gym a few weeks before. The plaintiff visited Virginia hospital Center emergency room and the doctor advised plaintiff to see an Orthopedic Surgeon because they believe the plaintiff might need hip surgery. Plaintiff saw the Orthopedic doctor at the University of Miami (Dr.Vielle Hernandez) stated the plaintiff don't need hip surgery but the pain on the plaintiff left side was "Trochanteric bursitis" recommended medication, therapy for 8 weeks and referred the plaintiff to Dr.Parekh a spine specialist for further evaluation for the shooting pain down plaintiff's left leg. Despite sending ETNA all these medical records and injury the FBI investigate the plaintiff for disability fraud. Plaintiff alleging Booz Allen Hamilton orchestrated a strategy to put the plaintiff in a position for entrapment Booz Allen Hamilton action was complicit to conspire to violate the plaintiff's Civil Rights and purposely set the plaintiff for arrest and compromise the plaintiff's freedom base on cruel, monovalent, discrimination, and retaliation for filling discrimination in the work place and set up the plaintiff for arrest believe the plaintiff would like to get

short disability and violation of Federal Laws which would be fraud to collect disability.

23. With the collusion of Booz Allen Hamilton, FBI Agents was at the hospital in the doctor's office at University of Miami Hospital as doctor (Dr.Amruta Parekh) examine him, plaintiff noticed two people inside the plaintiff's doctor's room an FBI agent white male 5feet10 and female (name known, plaintiff took a picture of her hadge) listed as a contractor for Scribe America. Plaintiff is alleging Booz Allen Hamilton setup the plaintiff to be arrested by the FBI, Booz Allen Hamilton was complicit in the actions and clear retaliation for filing discrimination. When plaintiff left the x-ray room and walked back to the plaintiff's doctor's room and hear and noticed a white gentleman 5feet 10 slim, no facial hair, looking at plaintiff's spine Xray with his doctor (FBI agent name unknown) ask Dr.Amruta "is his injury real", and the Dr.Amruta Parekh she said "yes at 4,5", Health and HIPAA privacy security rules laws was violated. (Hospital has video). Booz Allen Hamilton was complicit and strictly-liable for this incident and was retaliation for the plaintiff filing discrimination in work place. Booz Allen Hamilton actions was cruel, inhuman, monovalent to setup the plaintiff for arrest and violate the plaintiff's Civil Rights and Human Rights. The plaintiff is requesting the US District Court for Jury trial and full fact-finding judicial review to proof of all allegations.

THE UNLAWFUL EMPLOYMENT PRACTICES

24. Booz Allen Hamilton unfairly treated the plaintiff base on his race, color, national origin and hired the plaintiff on ground that the plaintiff had great experience and track record of success and capable of completing his work duties. Booz Allen Hamilton and employees' slander and destroyed the character of the plaintiff in his work place
VIOLATION OF FOURTH AMENDMENT ELECTRONIC COMUNICATION
PRIVACY ACT of 1986 (ECPA), THE CIVIL RIGHTS ACT OF 1964 TITLE VII:
SEC. 2000e-2. [Section 703](a), SEC. 2000e-2. [Section 703](b), SEC. 2000e-2.
[Section 703](d), SEC. 2000e-3. [Section 704](a), CODE OF VIRGINIA § 18.2-417,
D.C LAW § 31-2231.05, 42 U.S. CODE.1981, 42 U.S. CODE.1983, 42 U.S.

CODE.1985(3), 18 U.S. CODE § 241, 42 U.S. CODE § 1986, 42 U.S. CODE § 1985, LACK CARE OF DUTY, FOURTH AMENDMENT, NINTH AMENDMENT, CRUEL AND HUMAN RIGHTS. Booz Allen Hamilton hired employees that are Federal Law enforcement agents, to get close to the plaintiff for surveillance and place the plaintiff in position for entrapment and violate the plaintiff's Civil Rights. Most egregiously Booz Allen Hamilton retaliated against the plaintiff after filling factual discrimination claims to propel the plaintiff to be in position to violate Federal Laws for entrapment direct violation to VIOLATION OF FOURTH AMENDMENT ELECTRONIC COMUNICATION PRIVACY ACT of 1986 (ECPA), THE CIVIL RIGHTS ACT OF 1964 TITLE VII: SEC. 2000e-2. [Section 703](a), SEC. 2000e-2. [Section 703](b), SEC. 2000e-2. [Section 703](d), SEC. 2000e-3. [Section 704](a), CODE OF VIRGINIA § 18.2-417, D.C LAW § 31-2231.05, 42 U.S. CODE.1981, 42 U.S. CODE.1983, 42 U.S. CODE.1985(3), 18 U.S. CODE § 241, 42 U.S. CODE § 1986, 42 U.S. CODE § 1985, LACK CARE OF DUTY, FOURTH AMENDMENT, NINTH AMENDMENT, CRUEL AND HUMAN RIGHTS. Booz Allen Hamilton knowingly allowed persistent subjective discrimination tactics on the plaintiff which has an adverse impact on him direct violation of plaintiff's Civil Rights, discriminate on the plaintiff, cruel and inhuman and malevolent. Moreover, the Booz Allen Hamilton has been on notice of the disparities in the treatment of employees in the past since at least October 18 of 2013 and 2/10/2020 (Michael Ceres vs Booz Allen Hamilton) but Booz Allen Hamilton has intentionally failed to address adequately these unlawful employment practices. Booz Allen Hamilton has a track record of abusing its employees and creating a place for discrimination against employees.

THE PLAINTIFFS BACKGROUND

25. Plaintiff Harold Jean-Baptiste graduated cum laude from Long Island University with bachelor's in Information System and magna cum laude from Long Island University with an MBA in Finance and University of Baltimore Law Student. Plaintiff has no criminal history, or any history of any investigations of any crime. His background is clean and has no reason to be discriminated against by the FBI. Booz Allen Hamilton

conspired with the Federal Bureau Investigations under false pretense and flagged plaintiff for an investigation under National Security Branch Division of the FBI and used “National Security Letters” (NSL) classification as a tool used to be “invisible” in conspire to slander, use a gag order, to harass, discriminate, and destroyed the character of the plaintiff in his work place. Plaintiff has not been “alleged or suspected violation of any Federal Laws” or “no criminal history”, “never been arrested”, “investigate for anything criminal” or “ever attempted to carry out any crimes” or “threats to the national security” or “violate any foreign intelligence laws” under Department of Justice Manual section Title IV, 9-90-010, 9-90-020 9-90-050, 9-90-100, 9-90-200, 9-90-210, 9-90-230, 9-90-240, 9-90-300, 9-90-400, 9-90-440, 9-90-500, 9-90-550, 9-90-600, 9-90-610, 9-90-620, 9-90-625, 9-90-630, 9-90-640, 9-90-700, 9-90-710, 9-90-720 and 9-90-730. Most egregiously the plaintiff never attempted or violated any of the these statutes to be flagged under “National Security” base on criminal provisions affecting 2 U.S.C. § 192 (Contempt of Congress Related to National Security), 8 U.S.C. § 1185(b) (Travel Control of Citizens), 18 U.S.C. § 219 et seq. (Officers and Employees of the United States Acting as Foreign Agents), 18 U.S.C. § 791 et seq. (Espionage; Unauthorized Disclosure of Classified Information), 18 U.S.C. § 951 et seq. (Neutrality Laws), 18 U.S.C. § 1030(a)(1) (Computer Espionage), 18 U.S.C. § 1542 et seq. (Passport Violations Related to National Security), 18 U.S.C. § 1924 (Unauthorized Removal and Retention of Classified Documents or Material), 18 U.S.C. § 1831 (Economic Espionage), 18 U.S.C. § 2151 et seq. (Sabotage), 18 U.S.C. § 2381 et seq. (Treason, Sedition and Subversive Activities), 22 U.S.C. § 611 et seq. (Foreign Agents Registration), 22 U.S.C. § 2778 (Arms Export Control Act), 42 U.S.C. § 2274 to 2278, 2284, and other Atomic Energy Violations that Affect National Security (Atomic Energy Act), 50 U.S.C. § 3121 (Intelligence Identities Protection Act), 50 U.S.C. § 782 et seq. (Communication of Classified Information by Government Officer or Employee), 50 U.S.C. § 851 et seq. (Registration of Person Who Has Knowledge concerning Espionage Activities), 50 U.S.C. § 1701 et seq. (International Emergency Economic Powers Act), 50 U.S.C. § 2401 et seq. (Export Control Reform Act), 50 U.S.C. App. § 5(b) (Trading With the Enemy Act).

VIOLATION OF LAWS

26. The Booz Allen Hamilton subjected the plaintiff to cruel and violation of Human Rights to be free and have equal dignity and rights. Also no one shall be subjected to cruel, inhuman, or degrading treatment direct violation of Human Rights.
27. The Booz Allen Hamilton conspired to violate the plaintiff's Civil Rights, oppress, deprivation rights, privileges, or protected by the Constitution direct violation of 42 U.S. Code.1983 and Ninth Amendment.
28. The defendants Booz Allen Hamilton were negligent, lack of Care of Duty to deprive the rights of the plaintiff.
29. Booz Allen Hamilton slander and defame the character of the plaintiff a direct violation of Code of Virginia § 18.2-417, D.C Law § 31-2231.05
30. Booz Allen Hamilton tolerates an atmosphere of unfair work treatment, hostile work environment, exclusion from training and discrimination based on race, national origin and color, a full in violation of Title VII THE CIVIL RIGHTS ACT OF 1964 TITLE VII: SEC. 2000e-2. [Section 703](a), SEC. 2000e-2. [Section 703](b), SEC. 2000e-2. [Section 703](d).
31. The Booz Allen Hamilton willfully and negligently conspire to oppress, deprivation rights, privileges, or protected by the Constitution or Laws of the United States, direct violation of 18 U.S. Code § 241.
32. The Booz Allen Hamilton having knowledge of wrongs neglect to prevent illegal activity or deprivation rights, privileges, or protected by Federal Laws of the United States, direct violation of 42 U.S. Code § 1986.
33. The Booz Allen Hamilton willfully and negligently conspire to interfere with civil rights, deprivation rights, privileges, or protected by the Constitution or Laws of the United States, direct violation of 42 U.S. Code § 1985(3)

34. The Booz Allen Hamilton willfully and negligently violated FOURTH AMENDMENT ELECTRONIC COMMUNICATION PRIVACY ACT of 1986 (ECPA) by monitoring plaintiff's computer to find any reasons to interfere with civil rights, deprivation rights, privileges, or protected by the Constitution or Laws of the United States, direct violation of the FOURTH AMENDMENT ELECTRONIC COMMUNICATION PRIVACY ACT of 1986 (ECPA).
35. The Booz Allen Hamilton willfully and negligently violated FOURTH AMENDMENT RIGHTS TO PRIVACY by monitoring plaintiff's emails to conspire obstruct the plaintiff's Civil Rights, deprivation rights, privileges, or protected by the Constitution or Laws of the United States, direct violation of the FOURTH AMENDMENT RIGHTS TO PRIVACY.
36. Booz Allen Hamilton Retaliated for filing discrimination and subjecting the plaintiff to be in a position of duress instructed to file for short disability with the intention believing the plaintiff would lie to state false injury and violate Federal Laws to setup the plaintiff for arrest and violated his civil rights. Most egregiously Booz Allen Hamilton was complicit with the FBI to setup the plaintiff in position to violate Federal Laws , a direct violation of THE CIVIL RIGHT'S ACT OF 1964 TITLE VII: SEC. 2000e-3. [Section 704](a).
37. Booz Allen Hamilton Retaliation for filing discrimination actions was cruel, degrading treatment, violated the plaintiff Civil Rights and Human Rights violation to be free and equal in dignity and rights. The actions of Booz Allen Hamilton are a direct violation Civil Rights and Human Rights.
38. Plaintiff have experienced severe and pervasive unfair treatment base race, color, national origin, harassment, and retaliation beyond that which a reasonable person would tolerate. WHEREFORE, Plaintiff request that the court to execute a full fact-finding review, all adverse action to the plaintiff subjected to race, national origin, color discrimination, retaliation for filing discrimination and suffered severe emotional

distress from the Booz Allen Hamilton, and Human Rights violation. The Booz Allen Hamilton is liable for the actions against the plaintiff by violating THE CIVIL RIGHTS ACT OF 1964 TITLE VII, Constitutional Laws and Federal Statutes. The actions of Booz Allen Hamilton have cause the plaintiff to file a number of lawsuit in Federal Court against the FBI because the plaintiff filed a number of Color of Law Complaint against the FBI. The past lawsuits again the FBI was a snow ball effect of discrimination which was originated in Booz Allen Hamilton office and complicity with the FBI to violate the plaintiff's Civil Rights.

PRAYER FOR RELIEF

Plaintiffs request relief as follows:

- a. Issue a Declaratory Judgment against Booz Allen Hamilton practices at the firm for VIOLATION OF FOURTH AMENDMENT ELECTRONIC COMMUNICATION PRIVACY ACT of 1986 (ECPA), THE CIVIL RIGHTS ACT OF 1964 TITLE VII: SEC. 2000e-2. [Section 703](a), SEC. 2000e-2. [Section 703](b), SEC. 2000e-2. [Section 703](d), SEC. 2000e-3. [Section 704](a), CODE OF VIRGINIA § 18.2-417, D.C LAW § 31-2231.05, 42 U.S. CODE.1981, 42 U.S. CODE.1983, 42 U.S. CODE.1985(3), 18 U.S. CODE § 241, 42 U.S. CODE § 1986, 42 U.S. CODE § 1985, LACK CARE OF DUTY, FOURTH AMENDMENT, NINTH AMENDMENT, CRUEL AND HUMAN RIGHTS.
- b. Award punitive damages \$450,000,000 for discrimination and malevolent actions to destroy plaintiff's life according to proof disclose to the court. The plaintiff stating to the court life and freedom is priceless, living to help his 73-year-old mother is priceless, and raising children is priceless, therefore all the fortune of the world is not worth the plaintiff's freedom.
- c. Award damages for emotional distress for the plaintiff based on the fact the plaintiff character and professional career has been destroyed.

- d. Award the Plaintiff back pay, retired benefits, salary, full benefits and bonus lost.
- e. Award restatement of employment at Booz Allen Hamilton in same group of employment.
- f. Award full work medical insurance and life insurance policy for 30 years;
- g. Award any Attorneys' fees according to proof;
- h. Provide such other relief as may be deemed just and Prop.

Respectfully Submitted

Harold Jean-Baptiste

Harold Jean-Baptiste
253-37 148 Drive
Rosedale NY 11422

E-Mail: hbaptiste@influctec.com